

# COLEMAN

## NATURAL FOODS

---

January 18, 2007  
USDA-AMS LS No. 283-06  
Naturally Raised Livestock Marketing Claim  
Listening Session

**Subject:** Naturally Raised Standards and Claims

**Presenter:** Dennis M. Stiffler, Ph.D.  
Executive Vice President  
Coleman Natural Foods, LLC  
Golden, Colorado

### **Introduction:**

Coleman Natural Foods, LLC (Coleman) represents a collection of premier, entrepreneurial founded companies, national in scope, specializing in producing, raising and processing natural and organic protein products

### **Perspectives:**

It is Coleman's belief that the "Naturally Raised" alternative livestock production practice standard should include:

**Animal well-being and care-in-production** (humanely and sustainably raised);

**Identification/source verification;**

**Raising** (extensive) and **feeding practices** (diet – NO animal by-products or animal fats...Ever);

**NO antibiotics**...Ever;

**NO added hormones/growth modulators administered**...Ever;

**And, the resulting product.**

In addition, the application of any "Naturally Raised" standards and claims should be applicable to **all** food livestock species including poultry.

FSIS Ingredient and processing claims **must tie** to the scope of the AMS livestock claims to be considered "natural" and, if in fact, consumer expectations are to be met.

Through the efforts of growers-producers and natural-marketers, "natural" has come to be defined as products from alternative produced livestock raised without use of antibiotics or added growth hormones, fed all a vegetarian diet, and humanely and sustainably raised.

The term “natural” for single-ingredient muscle meat must be re-evaluated and re-defined in the context of the raising practices, not the product per se, in order to appropriately identify and label meat and poultry products.

This would assure consumers that products meet consistent, uniform standards and claims. Therefore, “Naturally Raised” using defined programs supported by systems and processes that verify and validate standards and claims will better serve the consuming public, reduce present confusion regarding the term “natural” and ensure greater transparency in the marketplace.

It will be important that AMS consult and consider established industry standards and best-science to develop the “Naturally Raised” standards and claims. These standards and claims should not be considered as a minimal threshold but should establish the best practices.

Carefully consideration must be given to requirements to demonstrate through pre-approved certification, quality managed systems (QMS), third-party accredited certification or self-certification programs how, in fact, compliance to developed standards and claims will be verified and validated.

Coleman would support the concept of an industry, trade, consumer advisory board (e.g., National Organic Standards Board, NOSB) that would work directly with AMS in establishing, directing and reviewing the standards and claims processes.

Coleman commends the AMS for this effort and we thank you for your consideration.